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**FS WORK PLAN  
U.S. DOE FERNALD  
OH6 890 008 976**

**07/10/90**

**USEPA/DOE-FMPC  
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LETTER**

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**  
**230 SOUTH DEARBORN ST.**  
**CHICAGO, ILLINOIS 60604**

REPLY TO THE ATTENTION OF:  
5HR-12

**JUL 10 1990**

Bobby J. Davis  
United States Department Of Energy  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: FS Work Plan  
U.S. DOE-Fernald  
OH6 890 008 976

Dear Mr. Davis:

In August 1988, the United States Department of Energy (U.S. DOE) submitted a Feasibility Study (FS) work plan for the remedial action at the Fernald site. The United States Environmental Protection Agency (U.S. EPA) completed a preliminary review of this document in late 1988, but due to U.S. DOE's multiple operable unit proposal these comments were never forwarded to U.S. DOE.

As discussed with U.S. DOE in recent months, a FS work plan for each operable unit needs to be prepared and submitted to U.S. EPA for review and approval. Enclosed is a copy of the preliminary FS work plan comments. These comments can act as a general guide for preparation of the five operable unit FS work plans.

The FS work plans should be submitted within thirty (30) days of the date of this letter.

Please contact me at (312) or FTS 886-4436, if there are any questions.

Sincerely,

Catherine A. McCord  
Remedial Project Manager

Enclosure

cc: Maury Walsh, OEPA  
Graham Mitchell, OEPA-SWDO  
Bill Britton, Westinghouse

FS WORK PLAN COMMENTS

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1. Section 2.2.3, Page 5, Paragraph 1: The last sentence contradicts the first point of the paragraph, which states that any actions at this operable unit will not be expected to impact other operable units.
2. Section 2.2.4, Page 5: The justification given for several areas being included in one operable unit indicates that there are two distinct wastes that are significantly different and would most likely require different methods of treatment. Generally, when different treatment methods are required, a separate operable unit can be created and technologies developed or assessed to address it.
3. Section 2.4, Page 10, Paragraph 1, Reference to Table 2.3: The work plan does not describe how the list of potential remedial actions in Table 2.3 was developed.
4. Section 2.3, Page 8, Item 7: The objective should also state that established standards are not necessarily protective. Therefore, the FS work plan should state that the target risk range for carcinogens.
5. Section 2.4, Page 10, Paragraph 1: The FS work plan does not describe how Table 2.3 was developed. It appears that the purpose of this table is to show the interdependency of potential remedial actions between operable units and between areas within operable units. Additionally, there is an interdependency of potential remedial actions between operable units. This does not meet the intent of operable unit concept.
6. Section 3.4.6, Page 11, Paragraph 1, Last sentence: The last sentence and the three bullets should more closely parallel RI/FS guidance.

For source control actions, the following types of alternatives should be developed to the extent practical: number of treatment alternatives ranging from one that would eliminate, or minimize the need for long term management; one or more alternatives that involve containment; and a no-action alternative.

7. Section 3.4.6, Page 11: In accordance with RI/FS guidance, groundwater response action should address the cleanup levels and timeframes. Alternatives should be developed that achieve ARARs as rapidly as possible.